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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ETIOPIA EVANS, *et al.*,

Plaintiffs,

v.

ARIZONA CARDINALS FOOTBALL CLUB,  
LLC, *et al.*,

Defendants.

Civil Case No.:3:16-CV-01030-WHA

**STIPULATION AND [PROPOSED]  
ORDER REGARDING EXPERT  
DEPOSITIONS AND EXPERT  
REPORTS**

1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, the parties respectfully submit this joint  
2 stipulation regarding the timing of expert depositions and expert response reports.

3 WHEREAS, plaintiffs served their two expert reports on June 30, 2017;

4 WHEREAS, under the Case Management Order (Dkt No. 90) provides “In aid of  
5 preparing an opposition or reply report, a responding party may depose the adverse expert  
6 sufficiently before the deadline for the opposition or reply report so as to use the testimony  
7 in preparing the response.”;

8 WHEREAS, under the Case Management Order, defendants’ opposition expert re-  
9 ports would be due on July 14, 2017;

10 WHEREAS, defendants requested depositions of plaintiffs’ experts before serving  
11 their opposition reports, but plaintiffs’ experts are not available for deposition before July  
12 14, 2017; and

13 WHEREAS, the parties have conferred and agreed to the following proposed modifi-  
14 cation of the schedule to permit defendants to depose plaintiffs’ experts before serving  
15 their opposition reports; and

16 WHEREAS, this proposed modification does not affect the date for the close of ex-  
17 pert discovery or the date for submission of dispositive motions:

18 **NOW THEREFORE, THE PARTIES BY COUNSEL HEREBY STIPULATE** as  
19 follows:

20 1. Plaintiffs shall present Dr. Benet for deposition in San Francisco on July 19,  
21 2017, and Dr. Neubauer for deposition in Baltimore at a mutually agreeable date and time  
22 on or before July 20, 2017.

23 2. The deadline for defendants’ opposition reports is extended from July 14,  
24 2017 until July 21, 2017.

25 3. The deadline for plaintiffs’ reply expert reports is extended from July 21,  
26 2017 until July 28, 2017.

27 4. Defendants shall make reasonable efforts to identify deposition dates for  
28 their experts that are agreeable to plaintiffs, but if they are unable to do so, such inability

shall not be a basis for extending any other deadline, including the foregoing deadline for plaintiffs' reply reports, so long as defendants make their experts available for deposition before the August 4 deadline for the close of expert discovery.

5. All other deadlines shall remain in effect.

DATED: July 10, 2017

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By: /s/ Benjamin C. Block  
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Attorneys for Plaintiffs

**SIGNATURE ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

The undersigned filer hereby attests that concurrence in the filing of the document to which this attestation is attached has been obtained from each signatory whose conformed signature appears thereon.

By: /s/Benjamin C. Block  
Benjamin C. Block (*pro hac vice*)

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

1. Plaintiffs shall present Dr. Benet for deposition in San Francisco on July 19, 2017 and Dr. Neubauer for deposition in Baltimore at a mutually agreeable date and time on or before July 20, 2017.

2. The deadline for defendants' opposition reports is extended from July 14, 2017 until July 21, 2017.

3. The deadline for plaintiffs' reply expert reports is extended from July 21, 2017 until July 28, 2017.

4. Defendants shall make reasonable efforts to identify deposition dates for their experts that are agreeable to plaintiffs, but if they are unable to do so, such inability shall not be a basis for extending any other deadline, including the foregoing deadline for plaintiffs' reply reports, so long as defendants make their experts available for deposition before the August 4 deadline for the close of expert discovery.

5. All other deadlines shall remain in effect.

DATED: July \_\_\_, 2017

\_\_\_\_\_  
THE HONORABLE WILLIAM ALSUP  
UNITED STATES DISTRICT JUDGE